UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In Re:

John S. Zobel

Chapter 13 Case No. 04-34379

Debtor

RESPONSIVE AFFIDAVIT OF BRIAN H. LIEBO

STATE OF MINNESOTA)
ss
COUNTY OF HENNEPIN)

Brian H. Liebo, being first duly sworn, states as follows:

- 1. I am the attorney for GRP Loan, LLC (hereinafter "GRP").
- 2. GRP is the holder of a September 13, 2003 mortgage secured by the debtors homestead which was assigned to GRP by assignment dated September 29, 2003.
- 3. GRP has filed a Proof of Claim in this matter in the amount of \$14,563.62 in pre-petition arrears and a total secured claim amount of \$364,730.13, which proof of claim is calculated as follows:

PRE-PETITION ARREARS

Payments: 5 @ \$2,778.15 ea. \$13,890.75 (3/04 through 7/04)

Monthly payment composition:

Principal: \$ 277.26

Interest: \$2,139.38

Escrow: \$ 361.51

Late Charges \$845.81

Foreclosure Fees & Costs \$829.50

Pre-petition attorneys fees (pursuant to §506(b)) \$250.00

Less Suspense Balance \$(1,252.44) TOTAL \$14,563.62

SECURED CLAIM (as of petition filing date)

Unpaid Principal Balance \$351,400.96 Interest from last paid installment \$12,656.30 (Per diem: \$71.26 x 178 days)

Late Charges \$845.81

Foreclosure Fees & Costs
Pre-petition attorneys fees (pursuant to §506(b))
Less Suspense
\$829.50
\$250.00
\$(1,252.44)
TOTAL \$364,730.13

4. Debtor executed said mortgage on September 15, 2003. Since that time, 13 contractual payments have come due. Debtor has failed to make 7 of the contractual payments. Further, Debtor's loan is currently post-petition due for September, 2004.

FURTHER YOUR AFFIDIANT SAYETH NOT

DATED: October 12, 2004

Brian H. Liebo

Subscribed and sworn to before me this // day of Office , 2004.

Notary Public

LAURA L. GIEFER

NOTARY PUBLIC - Minnesota

My Commission Expires Jan. 31, 2005